

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WHARTON LH LP,

Plaintiff,

v.

TRI-COASTAL DESIGN SERVICES,
LLC, TRI-COASTAL DESIGN GROUP,
INC., TRI-COASTAL DESIGN-
CHARACTER LICENSE, LLC, LOOP
DESIGN CO., MARVIN STUTZ,
MICHAEL MASTRANGELO, DENNIS
MASTRANGELO, TODD SOLOMON,
JOHN/JANE DOES 1-10 (fictitious
persons), and ABC CORP. 1-10
(fictitious entities),

Defendants.

HON. JOHN MICHAEL VAZQUEZ,
U.S.D.J.

Civil Action No. 2:20-cv-18008-JMV-
JBC

**NOTICE OF MOTION TO
REMAND**

(Document Electronically Filed)

Motion Day: January 19, 2021

PLEASE TAKE NOTICE that on January 19, 2021 or as soon thereafter as set by the Court, Plaintiff Wharton LH LP shall move before the Honorable John Michael Vazquez, United States District Judge, U.S. District Court, District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101, for an order remanding this case to the Superior Court of New Jersey Law Division – Morris County, and awarding Plaintiff attorneys' fees and costs for the improper removal and this remand motion;

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Plaintiff shall rely upon the accompanying brief and declaration;

PLEASE TAKE FURTHER NOTICE that oral argument is requested if timely opposition to the motion is filed; and

PLEASE TAKE FURTHER NOTICE that at that time and place aforesaid, Plaintiff will request that the proposed form of order submitted herewith be entered by the Court.

ATTORNEYS FOR PLAINTIFF
WHARTON LH LP

By: /s/ C. John DeSimone, III
C. John DeSimone, III, Esq.
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CERTIFICATION OF SERVICE

I, C. John DeSimone, III, Esq., hereby certify that, on this 24th day of December 2020, this MOTION TO REMAND was served on all counsel of record who have appeared to date through the Court's CM/ECF system.

/s/ C. John DeSimone, III
C. JOHN DESIMONE, III, ESQ.